

The court incorporates by reference in this paragraph and adopts as the findings and orders of this court the document set forth below. This document was signed electronically at the time and date indicated, which may be materially different from its entry on the record.



Dated: 09:20 AM March 14, 2022

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:) Chapter 11
Squirrels Research Labs LLC, et al.¹)
Debtors.) Case No. 21- 61491
) (Jointly Administered)
)
) Judge Russ Kendig

**ORDER ON MOTION FOR ESTABLISHMENT OF APPLICABLE HEARING
DATES AND DEADLINES FOR PLAN OF LIQUIDATION**

Upon the motion (the “Motion”)² of Squirrels Research Labs LLC (the “Debtor”), one of the above-captioned debtors and debtors-in-possession, to set a hearing to consider confirmation of the Plan and establish certain dates and deadlines related to the foregoing. The Court having considered the Motion pursuant to Section 105(d)(2)(B)(vi) of the Bankruptcy Code; having

¹ The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

determined that granting the relief requested in the Motion is in the best interests of the Debtor, its estate and creditors; and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Debtor is authorized to solicit, receive, and tabulate votes to accept the Plan.
3. The hearing to consider the confirmation of the Plan will be held on May 24, 2022

at 2:00 p.m., EST before the Honorable Russ Kendig, United States Bankruptcy Judge, Ralph Regula Federal Building and U.S. Courthouse, 401 McKinley Avenue, SW, Canton, Ohio 44702,

Dial In: (888) 684-8852; Access Code: 3303949#.³; *provided however*, the Court may continue the hearing without further notice.

4. The following dates and deadlines are established and shall apply in this Case.

<u>Event</u>	<u>Date or Deadline</u>
Deadline for Debtor to serve the Plan, the Hearing Notice, and this Order on all creditors and parties in interest, and Ballots on holders of claims entitled to vote	March 28, 2022
Deadline for Voting	April 25, 2022
Deadline for objections to the Plan	April 25, 2022
Deadline to file Certification of Ballots & Reply to Objections	May 2, 2022
Deadline to file Brief in Support of confirmation	May 2, 2022
Confirmation Hearing	May 24, 2022 at 2 p.m.

5. The Notice, attached hereto as Exhibit 1, is approved.

6. The form of the Ballot, attached hereto as Exhibit 2, is approved.

³ For further details on telephonic participation, please refer to Judge Kendig's Notice of Telephonic Hearing Procedure, dated March 18, 2020, at <https://www.ohnb.uscourts.gov/sites/default/files/memoranda/telephonic-hearing-procedure-31820.pdf>

7. The Debtor shall distribute the Solicitation Package to all holders of claims and interests entitled to vote on the Plan.

8. The Debtor reserves the right to make non-substantive or immaterial changes to the Plan, the Ballots, the Hearing Notice, and related documents without further order of the Court.

9. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

10. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order.

#

SUBMITTED BY:

/s/ Julie K. Zurn
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*Counsel for Squirrels Research Labs LLC,
Debtor and Debtor-in-Possession*

Exhibit 1

Hearing Notice

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: _____) Chapter 11
) _____
Squirrels Research Labs LLC, *et al.*¹) Case No. 21- 61491
) (Jointly Administered)
Debtors.) _____
) Judge Russ Kendig

**NOTICE OF HEARING OF CONFIRMATION OF THE CHAPTER 11 PLAN
AND RELATED VOTING AND OBJECTION PROCEDURES**

PLEASE TAKE NOTICE THAT on _____, 2022, the United States Bankruptcy Court for the Northern District of Ohio (the “Court”) entered an order [Docket No. _____] (the “Order”) (a) authorizing Squirrels Research Labs LLC (the “Debtor”), one of the above-captioned debtors to solicit acceptances for the *Plan of Liquidation* (as modified, amended, or supplemented from time to time, the “Plan”) filed on February 21, 2022; (b) approving the solicitation materials and documents to be included in the Solicitation Packages; and (c) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan.

PLEASE TAKE FURTHER NOTICE THAT the hearing at which the Court will consider confirmation of the Plan (the “Confirmation Hearing”) will commence on **May 24, 2022 at 2:00 p.m.** (ET), before the Honorable Russ Kendig, United States Bankruptcy Judge, Ralph Regula Federal Building and U.S. Courthouse, 401 McKinley Avenue, SW, Canton, Ohio 44702, **Dial In: (888) 684-8852; Access Code: 3303949#.**²; *provided however,* the Court may continue the hearing without further notice.

PLEASE TAKE FURTHER NOTICE THAT a copy of the Plan is enclosed with this Notice.

Your rights may be affected. You should read the Plan carefully and discuss it with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

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² For further details on telephonic participation, please refer to Judge Kendig’s Notice of Telephonic Hearing Procedure, dated March 18, 2020, at <https://www.ohnb.uscourts.gov/sites/default/files/memoranda/telephonic-hearing-procedure-31820.pdf>

VOTING ON THE PLAN

PLEASE TAKE NOTICE THAT the deadline for voting on the Plan is **April 25, 2022** (the “Voting Deadline”). If you received a Ballot and intend to vote on the Plan you must (a) follow the instructions carefully; (b) complete all of the required information on the Ballot; and (c) execute and return your completed Ballot so that it is actually received by the Debtors’ counsel either electronically or at the e-mail or street address listed below on or before the Voting Deadline. A failure to follow such instructions may disqualify your vote.

OBJECTING TO THE DISCLOSURE STATEMENT OR PLAN

PLEASE TAKE NOTICE THAT the deadline for filing objections to confirmation of the Plan is **April 25, 2022** (the “Plan Objection Deadline”). Any objection to the Plan must be in writing, filed with the Court, and served on Debtor’s counsel at the address listed below so as to be actually received on or before Plan Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT all items to be filed with the Court shall be filed at the following address:

Clerk of Court
U.S. Bankruptcy Court
Ralph Regula Federal Building
and U.S. Courthouse
401 McKinley Avenue, SW
Canton, Ohio 44702

All items to be served on Debtor’s counsel shall be served at the following address:

Brouse McDowell, LPA
c/o Julie K. Zurn
388 South Main Street, Suite 500
Akron, Ohio 44311
Phone: (330) 434-7459
Fax: (330) 253-8601
jzurn@brouse.com

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the corresponding deadline.

You or your attorney must also attend the Confirmation Hearing scheduled above.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Plan and may enter an order confirming the Plan and granting any related relief.

DATED: _____, 2022

Respectfully submitted,

/s/

Marc B. Merklin (0018195)

Julie K. Zurn (0066391)

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*Counsel for Squirrels Research Labs LLC,
the Debtor and Debtor-in-Possession*

Exhibit 2

Form of Ballot

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:) Chapter 11
)
Squirrels Research Labs LLC, *et al.*¹) Case No. 21- 61491
) (Jointly Administered)
Debtors.)
) Judge Russ Kendig

**CLASS ____ BALLOT FOR ACCEPTING OR REJECTING
PLAN OF LIQUIDATION**

Squirrels Research Labs LLC (“Debtor”), one of the above-captioned debtors and debtors-in-possession filed the *Plan of Liquidation* dated February 21, 2022 (the “Plan”) in the above-captioned chapter 11 case.

You should review the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your [claim] has been placed in Class [__] under the Plan. If you hold claims or equity interests in more than one class, you will receive a ballot for each class in which you are entitled to vote.

If your ballot is not received by Julie K. Zurn, izurn@brouse.com, Brouse McDowell, 388 S. Main Street, Suite 500, Akron, OH 44311 on or before April 25, 2022, your vote will not count as either an acceptance or rejection of the Plan.

If the Plan is confirmed by the Bankruptcy Court it will be binding on you whether or not you vote.

¹ The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

ACCEPTANCE OR REJECTION OF THE PLAN

The undersigned, the holder of a Class [] against the Debtor, in the unpaid amount of

Dollars (\$ _____)

(Check one box only)

[] ACCEPTS THE PLAN

[] REJECTS THE PLAN

Dated: _____

Print or type name of creditor: _____

Signature: _____

Title (if corporation or partnership) _____

Address:

11.25.2022 TO

Julie K. Zurn
Brouse McDowell, LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
Facsimile: 330-253-8601
jzurn@brouse.com